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By CM/ECF and Electronic Mail

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Juan Tacuri, et al.*,
22 Cr. 622 (AT)**

Dear Judge Torres:

The Government writes respectfully to request that this Court adjourn the pre-trial conference in this case currently scheduled for next Thursday, November 9, 2023, and exclude time until the new pre-trial conference date under the Speedy Trial Act.

As the Court is aware, the parties are currently scheduled to appear on November 9, 2023, at 1:00 pm for a status conference. The Government has produced a large amount of discovery in this case, which the defendants are reviewing, and the parties are all discussing the possibility of pretrial dispositions. The parties expect that, if they were to appear on November 9, 2023, they would ask the Court to schedule a status conference in approximately January 2024. Accordingly, in order to preserve the Court's resources and avoid unnecessary travel and expense (certain defendants and counsel are out-of-state), the parties believe that an adjournment of the status conference to mid-January would be appropriate.

Additionally, the Government respectfully requests that time be excluded up to and including the date of the adjourned pre-trial conference, pursuant to 18 U.S.C. § 3161(h)(7)(A), because, among other things, it will allow the defendants and their counsel to review discovery, determine what pre-trial motions, if any, to make and prepare such motions, prepare for trial, and engage in disposition discussions. Defense counsel consent to this request. A proposed order excluding time is attached.

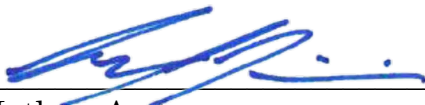
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Please feel free to contact us with any questions or issues.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:


Mathew Andrews
Michael D. Maimin
Assistant United States Attorney
(914) 993-1919 / (212) 637-2340

cc: Frank Gaviria, Esq. (counsel for Juan Tacuri) (by electronic mail and CM/ECF)
Gregory K. Showers, Esq. (counsel for Antonia Perez Hernandez) (by electronic mail and CM/ECF)
John Phillip Buza, Esq. (counsel for Nestor Nunez) (by electronic mail and CM/ECF)
Ken Womble, Esq. (counsel for Ramon Perez) (by electronic mail and CM/ECF)

GRANTED. The conference scheduled for November 9, 2023, is ADJOURNED to **January 16, 2024 at 11:40 a.m.**

It is further ordered that time until January 16, 2024, is excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), because the ends of justice served by excluding such time outweigh the interests of the public and Defendant in a speedy trial in that this will allow the parties to reach a potential pretrial disposition of this matter.

SO ORDERED.

Dated: November 6, 2023
New York, New York


ANALISA TORRES
United States District Judge